

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

John Stancu,

Plaintiff,

vs.

Hyatt Corporation/Hyatt Regency Dallas,

Defendant.

§
§
§
§
§
§
§
§

CIVIL ACTION NO. 3:17-CV-675-S-BN

CONSOLIDATED WITH

CIVIL ACTION NO. 3:17-CV-29180-S-BN

DECLARATION OF JOHN JANSONIUS

I, John Jansonius, in accordance with 28 U.S.C. § 1746, make this declaration under oath and penalty of perjury.

1. My name is John V. Jansonius. I am an attorney in good standing and licensed to practiced law in the State of Texas since 1980. I am admitted to practice in this Court. I am the lead attorney for this case on behalf of our client, Defendant Hyatt Corporation.

2. I make this Affidavit based on my own personal knowledge.

3. I am a partner in the labor and employment section of the law firm of Jackson Walker LLP (“Jackson Walker”). I am board certified in labor and employment law by the Texas Board of Legal Specialization. I reside and practice law in Dallas, Texas. I am familiar with the practices and procedures of the Dallas legal market.

4. Exhibit 1 contains a detailed accounting of the costs incurred and time spent by Jackson Walker in connection with responding to Plaintiff John Stancu’s motion to compel (Doc. 70) (the “Motion”). Each row containing my name contains a description of the work that I performed on this case in connection responding to Plaintiff’s Motion. Similarly, each row containing David Schlottman’s name contains a description of the work that he performed on this case in connection with responding to Plaintiff’s Motion. Each row containing Terri Salter’s name

contains a description of the work that she performed on this case in connection with responding to Plaintiff's Motion. We recorded all of our time entries at or near the time we performed the work. All such work and costs were reasonable and necessary in connection with responding to Plaintiff's Motion.

5. As demonstrated in Exhibit 1 to this Declaration, I spent a total of .7 hours in connection with responding to Plaintiff's Motion. Jackson Walker charged \$565.00 per hour for my time on this case. David Schlottman, an associate at Jackson Walker, spent a total of 9.4 hours in connection with responding to Plaintiff's Motion. Jackson Walker charged \$265.00 per hour for Mr. Schlottman's time on this case. Terri Salter, a paralegal at Jackson Walker, spent a total of 4.7 hours in connection with responding to Plaintiff's Motion. Jackson Walker charged \$144.00 per hour for Ms. Salter's time on this case.

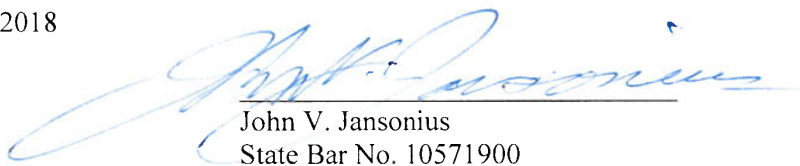
6. A copy of my CV is attached as Exhibit 2. A copy of Mr. Schlottman's CV is attached as Exhibit 3.

7. Ms. Salter has worked as a paralegal for over twenty years.

8. Based on my knowledge of the legal market in the Dallas area, the hourly rates of myself, Mr. Schlottman, and Ms. Salter in responding to Plaintiff's Motion are reasonable, usual, and customary for attorneys of similar experience at firms of similar size and caliber to that of Hyatt's counsel. Additionally, the total time spent by Hyatt's counsel in responding to Plaintiff's Motion (14.8 hours) is reasonable and necessary.

I declare under penalty of perjury that the foregoing statements are true and correct.

Dated: April 12, 2018


John V. Jansonius
State Bar No. 10571900

Date	Timekeeper Name	Billed Amount	Billed Hours	Narrative
12/22/2017	Schlottman, David	\$26.50	0.1	Email plaintiff regarding conference on plaintiff's potential motion to compel.
12/28/2017	Schlottman, David	\$53.00	0.2	Receipt and review of plaintiff's motion to compel.
12/29/2017	Schlottman, David	\$26.50	0.1	Review order striking and un-filing plaintiff's motion to compel.
12/29/2017	Schlottman, David	\$159.00	0.6	Email plaintiff regarding defendant's position on various discovery disputes for motion conference.
1/5/2018	Schlottman, David	\$26.50	0.1	Call from plaintiff regarding additional conference on plaintiff's motion to compel.
1/8/2018	Schlottman, David	\$132.50	0.5	Draft joint status report submission for plaintiff's renewed motion to compel.
1/12/2018	Jansonius, John V.	\$105.00	0.2	Review filing notices from district clerk along with motion to compel and appendix filed by J. Stancu.
1/16/2018	Schlottman, David	\$53.00	0.2	Receipt and review of plaintiff's re-filed motion to compel.
1/16/2018	Schlottman, David	\$26.50	0.1	Receipt and review of order requiring plaintiff to re-file latest motion to compel in conformity with court's order.
1/24/2018	Jansonius, John V.	\$105.00	0.2	Review court notices and filings (motion to compel and related material) by J. Stancu.
1/25/2018	Jansonius, John V.	\$52.50	0.1	Review order requiring response to plaintiff's second motion to compel.
1/30/2018	Schlottman, David	\$715.50	2.7	Draft response to plaintiff's motion to compel.
1/31/2018	Schlottman, David	\$821.50	3.1	Continue to draft response to plaintiff's motion to compel.
2/1/2018	Salter, Terri K.	\$230.40	1.6	Prepare appendix and exhibits for response to motion to compel.
2/1/2018	Schlottman, David	\$265.00	1	Continue to draft and revise response to Plaintiff's motion to compel.
2/2/2018	Salter, Terri K.	\$446.40	3.1	Finalize response to motion to compel and appendix in support and file and serve same.

EXHIBIT 1

2/2/2018 Schlottman, David	\$26.50	0.1	Review appendix in support of response to motion to compel.
2/2/2018 Schlottman, David	\$53.00	0.2	Conferences with T. Salter (legal assistant) regarding finalization of response to motion to compel for filing.
2/2/2018 Schlottman, David	\$106.00	0.4	Revise and finalize response to motion to compel for filing.
2/2/2018 Jansonius, John V.	\$105.00	0.2	Review draft of response to plaintiff's motion to compel and appendix to response brief.
	\$3,535.30	14.8	



John V. Jansonius

Partner, Dallas

214.953.5970 | jjansonius@jw.com

Practice Areas

- Labor and Employment
- Labor and Employment Litigation
- Litigation

Education

B.A., *cum laude*, Drake University

J.D., SMU Dedman School of Law

Bar Admissions

Texas, 1980

Minnesota, 1981

Oklahoma, 2014

Certification

Board Certified in Labor and Employment Law by the Texas Board of Legal Specialization

Court Admissions

- United States Supreme Court
- United States Courts of Appeals for the Fifth, Eighth, and Tenth Circuits
- United States District Courts for the Northern, Southern, Eastern and Western Districts of Texas
- All courts in Minnesota, Oklahoma, and Texas

Recognition

- Texas Top 100, Texas Monthly – Thompson-Reuters, 2010-2011, 2013-2014, 2016
- Super Lawyers, Thomson Reuters, 2003-2017
- *Who's Who Legal*: Texas, Labour, Employment & Benefits, 2016
- Chambers USA, *America's Leading Lawyers for Business*
 - Ranked for Employment: Mainly Defendant – Texas, 2002 – 2006
 - Ranked for Labor & Employment – Texas, 2007-2017
- Chambers International, 2018
- Lawyer of the Year, *The Best Lawyers in America* (Woodward/White Inc.)
 - Labor and Employment Law, 2010, 2012
 - Labor Law, 2014
- *The Best Lawyers in America*
 - Employment Law – Management, 2017-2018
 - Labor Law – Management, 2017-2018
- Best Lawyers in Dallas – D Magazine, 2017



- Leading Labor and Employment Lawyers in Texas, *Chambers USA*
- Top 100 Dallas-Fort Worth, multiple years

Biography

John V. Jansonius has 38 years' experience in labor and employment law. He focuses his practice on: contract and compensation negotiations and disputes with corporate officers and managers; defense of employment discrimination claims and wrongful discharge claims; collective bargaining, representation cases, and unfair labor practice claims under the National Labor Relations Act; denial of benefits claims under the Employee Retirement Income Security Act; advising on employment and labor aspects of business transactions and investigations and employment and labor related concerns. He has represented clients in numerous jury and non-jury trials in state and federal court and has presented oral arguments to the U.S. Supreme Court and the federal circuit courts of appeals.

John is rare among labor and employment lawyers in having experience and expertise in the board room, at the bargaining table, and in the courtroom. His experience, and his current practice, ranges from counseling boards of directors of publicly traded companies to serving as counsel to company negotiating committees in collective bargaining with labor unions. Rounding out John's practice is regular involvement as defense counsel in employment litigation and counseling management on executive and employee relations matters and compliance with federal and state labor and employment law. Few lawyers have been as long and steadily involved in the full array of labor and employment law as it has steadily evolved over the past generation as John, and this gives him a unique ability to counsel and defend businesses in their legal relationships with executives, salaried and hourly paid employees, and labor unions.

Practice Experience

Over his 38 years in practice, John has served as lead counsel in countless employment litigation cases; counsel to management on executive compensation and employee relations aspects in a wide variety of business transactions; management counsel in collective bargaining, contract administration, and unfair labor practice defense in the labor relations context; and he routinely works with corporate counsel, executive management, and human resources to resolve specific employee relations issues and to develop programs and strategies to minimize risk.

Among John's specific areas of expertise are:

- Defense of claims alleging unfair or discriminatory compensation practices
- Representation of management in union representation cases, unfair labor practice cases, and grievance arbitrations
- Counseling and representing corporations and other business entities in executive relations and the labor and employment aspects of mergers and acquisitions and other business transactions
- Arbitration and litigation defense of employment discrimination and wrongful discharge claims
- Internal investigations concerning labor and employment matters



Community Experience

- State Bar of Texas
 - Board of Directors, 2008-2011, 2014-2017
 - Executive Committee, 2016-2017
 - Named Outstanding Director, 2017
 - Texas Access to Justice Commission, Commissioner, 2014-Present
 - Legislative Policy Committee, Chair, 2015-Present
 - Grievance Committee for District 6, Panel Chair, 2013-2014
 - Client Security Fund, Chair, 2010-2011
 - Labor & Employment Section, Chair, 2004-2005
 - College of the State Bar of Texas, 1990-Present
- Texas Bar Foundation, Fellow
- Dallas Bar Association
 - Judicial Committee, Co-Chair, 2014
 - New Laws/Legislation Committee, Chair, 1995
- Dallas Bar Foundation, Fellow
- American Bar Association
- American Bar Foundation, Fellow
- American Employment Law Council (AELC), 2011-Present
- College of Labor and Employment Lawyers, Fellow, 2006-Present
- Employment Discrimination Law treatise, Editorial Board, 2013-Present
- General Counsel Forum – DFW Chapter, Board of Directors, 2001-2012
- Industrial Relations Research Association – North Texas Chapter, President, 1987
- North American Transportation Employee Relations Association, President, 2010
- United States Court of Appeals for the Fifth Circuit Pattern Jury Charges for Employment Litigation, Advisory Committee, 2005-2008
- Minnesota State Bar Association
- Oklahoma Bar Association





David Schlottman

Associate, Dallas

214.953.6068 | dschlottman@jw.com

Practice Areas

- Labor & Employment
- Labor and Employment Litigation
- Business Litigation
- Arbitration

Education

B.A., with *high honors*, Abilene Christian University

J.D., *magna cum laude*, Baylor University School of Law

- Editor-in-Chief, Baylor Law Review, 2011-2012

Bar Admissions

Texas, 2012

Court Admissions

- United States District Courts for the Northern, Southern, Eastern and Western District of Texas

Recognition

- Rising Stars, Thomson Reuters, 2017

Biography

David Schlottman is an advisor and litigator who focuses on complex cases involving employees, the workplace, and related business disputes. He has wide-ranging experience in helping clients with business problems and lawsuits involving wage-and-hour issues, employee competition, theft of trade secrets, contract claims, compensation disputes, employment discrimination and retaliation, and union-related disputes.

David distinguishes his practice through preparation, knowledge of the rules, exceptional work product, and accessibility and responsiveness to clients. Whether the case is big or small, David strives to deliver creative and tailored case strategies in line with a client's business objectives and cost expectations.

David stays current on relevant legal trends through regular participation in local bar activities and assisting with continuing legal education presentations. Additionally, David has served as a contributor to the influential treatise *Employment Discrimination Law*, which is published by the American Bar Association's Section of Labor & Employment Law.

Throughout law school at Baylor, David was recognized for his advocacy and written work product. He was a member of winning mock trial and moot court teams. He was also published in the *Baylor Law Review* and later served as its Editor-in-Chief for the 2011-2012 school year.



Practice Experience

Wage-and-Hour Litigation

A principal focus of David's practice is defending wage-and-hour litigation under the Fair Labor Standards Act. His experience ranges from single-plaintiff lawsuits to large, multi-plaintiff and collective actions concerning:

- Unpaid Overtime
- Unpaid Wages
- Employee Misclassification
- Tip Disputes
- FLSA Retaliation

Competition/Trade-Secrets Litigation

David also focuses his practice on claims involving employee competition and trade secrets. He has brought and defended lawsuits on behalf of companies and individuals regarding:

- Theft of Trade Secrets
- Breach of Non-Compete Agreements
- Breach of Fiduciary Duty

Employment Litigation

David has experience defending companies and managers in a variety of employment-related lawsuits, including claims over:

- Discrimination
- Harassment
- Retaliation
- Improper Denial of Medical Leave
- Wrongful Termination/Breach of Employment Contract
- Defamation
- Compensation/Bonus/Stock Option Disputes
- False Imprisonment

Traditional Labor Relations

David represents management in disputes involving unions and the National Labor Relations Board. His experience includes:

- Defending employers against unfair labor practice charges filed with the NLRB
- Counseling management in union disputes and collective bargaining
- Representing management in labor arbitrations under CBAs

Employment Counseling

In addition to litigating disputes, David helps employers proactively avoid lawsuits through planning, counseling, and advising about day-to-day operations. Whether it is reviewing a company's employment policies or addressing the best way to handle a difficult employee, David offers practical and forward-looking advice to prevent future litigation.



Community

- Dallas Bar Association

